

1 ERNEST GALVAN – 196065
2 BLAKE THOMPSON – 255600
3 ROSEN BIEN GALVAN & GRUNFELD LLP
4 315 Montgomery Street, Tenth Floor
5 San Francisco, California 94104-1823
6 Telephone: (415) 433-6830
7 Facsimile: (415) 433-7104
8 Email: egalvan@rbgg.com
9 bthompson@rbgg.com

7 BRIAN A. VOGEL – 167413
8 THE LAW OFFICES OF BRIAN A. VOGEL, PC
9 770 County Square Drive, Suite 104
10 Ventura, California 93003
11 Telephone: (805) 654-0400
12 Facsimile: (805) 654-0326
13 Email: brian@bvogel.com

11 LANCE WEBER – Fla. Bar No. 104550*
12 HUMAN RIGHTS DEFENSE CENTER
13 P.O. Box 1151
14 Lake Worth, Florida 33460
15 Telephone: (561) 360-2523
16 Facsimile: (866) 735-7136
17 Email: lweber@humanrightsdefensecenter.org

15 * *Pro Hac Vice* Application To Be Filed

16 Attorneys for Plaintiff

17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA
19

20 PRISON LEGAL NEWS,

21 Plaintiff,

22 v.

23 COUNTY OF VENTURA, et al.,

24 Defendants.
25

Case No. CV-14-0733 GHK (Ex)

**JOINT STIPULATION AND
REQUEST FOR ORDER EXTENDING
DEFENDANT COUNTY OF
VENTURA'S DEADLINE TO SERVE
AN INITIAL RESPONSIVE
PLEADING TO THE COMPLAINT
UNTIL APRIL 6, 2014**

26
27 ///
28

1 **THIS JOINT STIPULATION IS ENTERED INTO** by and between Plaintiff
2 PRISON LEGAL NEWS (“PLN”) and Defendant COUNTY OF VENTURA,
3 (collectively, the “parties”), by and through their attorneys of record:
4

5 **WHEREAS**, Plaintiff PLN filed the Complaint on February 4, 2014;

6 **WHEREAS**, on February 5, 2014, Plaintiff served Defendant County of Ventura
7 with the Summons and Complaint;
8

9 **WHEREAS**, all individual Defendants, by and through their attorney of record
10 Jeffrey Held of Wisotsky, Procter & Shyer, executed and filed waivers of service on
11 February 7, 2014;
12

13 **WHEREAS**, currently the deadline for filing of an initial responsive pleading to
14 the Complaint for Defendants Rick Barrios, Geoff Dean, Linda Oksner, and Gary Pentis
15 is April 6, 2014;
16

17 **WHEREAS**, currently the deadline for filing of an initial responsive pleading to
18 the Complaint for Defendant County of Ventura is February 26, 2014;

19 **WHEREAS**, on February 7, 2014, Plaintiff and Defendant County, by and
20 through its attorney of record Jeffrey Held of Wisotsky, Procter & Shyer, agreed to
21 extend the deadline for Defendant County to file an initial responsive pleading to the
22 Complaint from February 26, 2014 to April 6, 2014, so that the deadline for an initial
23 responsive pleading to the Complaint is the same for all Defendants;
24

25 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between the
26 parties that the filing deadline for Defendant County for Ventura’s initial responsive
27
28

1 pleading to the Complaint should be April 6, 2014.

2 The parties respectfully request that the Court sign the [Proposed] Order attached
3 hereto which reflects the terms of the above joint stipulation.
4

5 IT IS SO STIPULATED.

6 Dated: February 11, 2014

WISOTSKY, PROCTER & SHYER

7
8
9 By: 

JEFFREY HELD

Attorneys for Defendant County of Ventura

10
11 DATED: February 11, 2014

ROSEN BIEN GALVAN & GRUNFELD LLP

12
13 By: /s/

Ernest Galvan

14
15 DATED: February 11, 2014

THE LAW OFFICES OF BRIAN A. VOGEL, PC

16
17 By: /s/

Brian A. Vogel

18
19 DATED: February 11, 2014

HUMAN RIGHTS DEFENSE CENTER

20
21 By: /s/

Lance Weber

22 Attorneys for Plaintiff
23
24
25
26
27
28